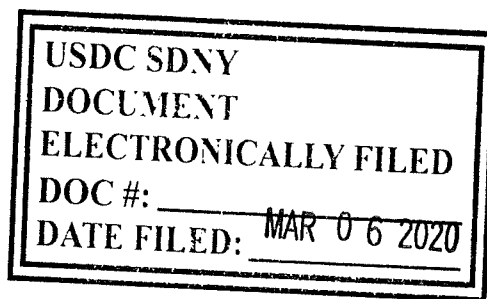


Your ref

Our ref



Kennedys

VIA ECF

Honorable Alison J. Nathan
United States District Judge
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
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March 2, 2020

Re: *Scottsdale Insurance Company v. Parkside Construction Builders Corp. and Randy Figueroa*

Case No. : 19 CV 00505
Our File No. : USS024.966056

Dear Honorable Judge Nathan:

This firm is counsel for Plaintiff, Scottsdale Insurance Company ("Scottsdale"), in the above-referenced matter. Scottsdale filed an Amended Complaint on January 21, 2020, adding Anthony T. Rinaldi LLC dba The Rinaldi Group ("Rinaldi") and LAM Pearl Street Hotel LLC ("LAM Pearl") as Defendants.

Pursuant to this Court's Order dated February 7, 2020, the parties are required to give a joint status update advising the Court of whether additional discovery is necessary in this matter within four weeks after both of the added Defendants are served. Rinaldi and LAM Pearl were served on February 3rd and 4th respectively. Defendant, Parkside Construction Builders Corp. ("Parkside"), was also served with the Amended Complaint on February 4, 2020. Affidavits of service are attached to this correspondence. To date, Parkside, Rinaldi and LAM have not appeared in this action.

Due to some service issues, Defendant Randy Figueroa was served on February 28, 2020 but we are not yet in receipt of the affidavit of service. Mr. Figueroa's answer is due on March 20, 2020. Once Mr. Figueroa answers, we intend to provide a joint status report to the Court.

With respect to Rinaldi and LAM Pearl, we request permission to move for a default judgment against Parkside, Rinaldi and LAM Pearl.

I thank the Court for your consideration of this matter.

Respectfully submitted,

Ann Odelson

Ann Odelson

cc: All Parties of Record via ECF

If the appearing Defendant, Randy Figueroa opposes the entry of default judgment against the non-appearing Defendants before adjudication of the claims against him, then he must notify Plaintiff and the Court within one week of the date of this Order. Otherwise, Plaintiff may move for default judgment against all non-appearing Defendants.

Additionally, the Court extends the deadline to provide a joint status report to one week after Defendant Randy Figueroa answers the Amended Complaint.

SO ORDERED.

SO ORDERED:

[Signature]

HON. ALISON J. NATHAN
UNITED STATES DISTRICT JUDGE

3/3/20